

To: Wu, Jennifer[Wu.Jennifer@epa.gov]
From: Henning, Alan
Sent: Tue 9/29/2015 4:06:27 PM
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMAs' TMDL Implementation Plans

OK

From: Wu, Jennifer
Sent: Tuesday, September 29, 2015 9:01 AM
To: Henning, Alan <Henning.Alan@epa.gov>
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMAs' TMDL Implementation Plans

Hey Alan, I just talked with him briefly on it. We hadn't talked specifically about moving the TMDL implementation plans in that direction, but I brought up the idea of having the 9 elements in the TMDL implementation plan. I think I'll set up a meeting next week when Jayne's back and we can discuss more as I'm thinking about our 10/15 meeting.

Back to work on FOIA!

From: Henning, Alan
Sent: Tuesday, September 29, 2015 8:52 AM
To: Wu, Jennifer
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMAs' TMDL Implementation Plans

Jenny,

This is good "food for thought" and that is the direction I would like to see the State go in. However, I think the State is hoping EPA will compare the TMDLs/TMDL implementation plans with the five elements on pages 35 and 36 of the NPS Guidelines rather than evaluate the plans to determine if they address the nine elements of the WBPs. Evaluating the plans relative to the nine elements seems to be a higher bar to attain than comparing the plans with the five

elements on pages 35/36.

I want to discuss this with Cyd to get her perspective.

Have you had conversations with Gene where he has indicated that the State is interested in redefining the TMDL implementation plans to include the nine elements?

Give me a call if you want to chat about this.

Alan

From: Wu, Jennifer
Sent: Tuesday, September 29, 2015 8:28 AM
To: Henning, Alan <Henning.Alan@epa.gov>
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMA's
TMDL Implementation Plans

Hi Alan, I was thinking that ODEQ was talking about how they might change their TMDL implementation plans in the future to address the 9 elements. I agree that the current TMDL Implementation plans as is would probably always or most of the time not cover the 9 elements of a watershed plan. Have you guys thought of amending TMDL implementation plans to become a watershed plan? Just some food for thought. Thanks! - Jenny

From: Henning, Alan
Sent: Monday, September 28, 2015 5:02 PM
To: KISHIDA Koto
Cc: FOSTER Eugene P; Croxton, Dave; Wu, Jennifer; Carlin, Jayne
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMA's

TMDL Implementation Plans

Koto,

Let's talk on Thursday. I will at an OWEB meeting on Friday.

From: KISHIDA Koto [<mailto:Kishida.Koto@deq.state.or.us>]
Sent: Monday, September 28, 2015 4:52 PM
To: Henning, Alan <Henning.Alan@epa.gov>
Cc: FOSTER Eugene P <FOSTER.Eugene@deq.state.or.us>; Croxton, Dave <Croxton.David@epa.gov>; Wu, Jennifer <Wu.Jennifer@epa.gov>; Carlin, Jayne <Carlin.Jayne@epa.gov>
Subject: RE: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMA's
TMDL Implementation Plans

Alan

Thank you for looking into the possibility of Oregon to use TMDLs/WQMP/IPs as alternatives to WBPs. I will work on completing the form later this week.

My understanding is that EPA will evaluate the potential alternative plan against the list of planning elements on page 35 of the 319 Guidelines document (IX B ii) to evaluate the adequacy of the alternative plan. I think it would be helpful to review those elements and see how they relate to the 9 key elements.

I'll try to give you a call on Thursday morning or Friday. Will you be around then?

Thank you again,

Koto

From: Henning, Alan [<mailto:Henning.Alan@epa.gov>]
Sent: Monday, September 28, 2015 3:03 PM
To: KISHIDA Koto
Cc: FOSTER Eugene P; Croxton, Dave; Wu, Jennifer; Carlin, Jayne
Subject: Watershed Based Plans vs OR TMDLs/Water Quality Management Plans/DMA's
TMDL Implementation Plans

Koto:

You raised a question about EPA's position on whether DEQ's TMDLs and the associated implementation plans would be considered as Watershed Based Plans (WBPs) for purposes of 319 funding. WBPs include nine specific elements which are included in the attached table. I do think the State's TMDLs/TMDL implementation plans do include and address some of the nine WBP elements, however, I do not think there is a complete overlap. The WBP elements seem to ask for greater detail in items such as the pollutant reduction capabilities of management measures used to address the pollutants, implementation costs and sources of funding, milestones for implementation, etc.. To get your perspective, it would be great if you would complete the attached table. When completed, the table will show how you think DEQ's TMDLs/TMDL implementation plans/"other documents" do or do not address the nine WBP elements. Feel free to give me a call if you have any questions.

Thanks Koto.

Alan

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